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22 *Attorneys for Plaintiff Alexis Harris*

23 **UNITED STATES DISTRICT COURT**

24 **DISTRICT OF NEVADA**

25 ALEXIS HARRIS, on behalf of herself  
26 and all others similarly situated,

27 Case No: 2:19-cv-00882-JAD-GWF

28 Plaintiff,

29 vs.

30 HAT WORLD, INC. d/b/a and a/k/a LIDS  
31 LOCKER ROOM; DOES 1 through 50;  
32 inclusive,

33 **STIPULATION AND ORDER TO  
34 EXTEND TIME TO FILE PROPOSED  
35 DISCOVERY PLAN**

36 (Second Request)

37 Defendant(s).

38 **STIPULATION AND ORDER TO EXTEND TIME**  
39 **TO FILE PROPOSED DISCOVERY PLAN**

40 The parties, by and through their respective counsel of record, submit the  
41 following Stipulation And Order To Extend Time To File Proposed Discovery Plan.

42 1. On May 24, 2019, Defendant Hat World Inc. d/b/a and a/k/a Lids Locker  
43 Room (“Defendant”) removed this matter to federal court. ECF No. 1, p. 1.

1           2. On May 31, 2019, Defendant filed its Answer to Plaintiff's Class Action  
2 Complaint. ECF No. 7, p. 1. Such Answer declared that Defendant "intends to file a  
3 motion to compel arbitration" in this matter. *Id.* at p. 2, line 20.

4           3. On July 9, 2019, Defendant's counsel presented to Plaintiff's counsel a  
5 courtesy copy of the purported arbitration agreement upon which Defendant intends to  
6 move to compel arbitration

7           4. The parties proposed discovery plan was initially due on July 15, 2019.  
8 ECF No. 7. On July 10, 2019, the parties requested a period of twenty-one additional  
9 days up to and including August 5, 2019 to file a proposed discovery plan and  
10 scheduling order should the parties not achieve agreement on whether this matter  
11 should be submitted to arbitration. The Court granted the parties' request in an order  
12 dated July 11, 2019. ECF No. 10.

13           5. The parties proposed discovery plan is currently due on August 5, 2019.  
14 ECF No. 11.

15           6. Plaintiff's counsel is currently reviewing the purported arbitration  
16 agreement. Following such review, the parties will meet and confer in good faith to  
17 explore the possibility of mutually submitting to arbitration, the status of the matter, and  
18 any other potential threshold issues.

19           7. The parties request a period of twenty-one additional days up to and  
20 including August 26, 2019 to file a proposed discovery plan and scheduling order should  
21 the parties not achieve agreement on whether this matter should be submitted to  
22 arbitration.

23           8. This request is not sought for any improper purpose or other reason of  
24 delay. Rather, it is sought only to conserve expenditures and resources of this Court while  
25 the parties engage in such good faith discussions which may result in the avoidance of  
26 costly and potentially unnecessary motion practice.

27           ///

28

1                   Wherefore, the parties respectfully request a period of twenty-one additional  
2 days up to and including August 26, 2019 to file a proposed discovery plan and  
3 scheduling order should the parties not achieve agreement on whether this matter  
4 should be submitted to arbitration.

5                   Respectfully submitted,

6                   Dated this 5th day of August 2019.

7                   Dated this 5th day of August 2019.

8                   /s/ Christian Gabroy  
9                   Christian Gabroy  
10                  Nev. Bar No. 8805  
11                  Kaine Messer  
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26                  *Attorneys for Defendant*

27                  **IT IS SO ORDERED.**

28                  August 23, 2019

29                  Date

  
30                  \_\_\_\_\_  
31                  CLAYTON J. ZOUCHAL  
32                  UNITED STATES MAGISTRATE JUDGE